

Thomas Marc Litton (CA Bar # 119985)
SANFORD WITTELS & HEISLER, LLP
120 Montgomery Street, Suite 1600
San Francisco, CA 94104
Telephone: (415) 421-4770
Facsimile: (415) 421-4784

Steven L. Wittels
SANFORD WITTELS & HEISLER, LLP
950 Third Avenue, 10th Floor
New York, New York 10022
Telephone: (646) 723-2947
Facsimile: (646) 723-2948
swittels@nydclaw.com
Admitted Pro Hac Vice

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

VALERIE GEORGE, as Administrator and
Personal Representative of THE ESTATE OF
RYAN GEORGE; VALERIE GEORGE and/or
TAJMAH BEAUCHAMP, as Legal
Representative(s) for Jaida George and Ryan
George, Jr.; VALERIE GEORGE, Individually;
DONALD GEORGE; and TAJMAH
BEAUCHAMP, Individually,

Plaintiffs,

vs.

SONOMA COUNTY SHERIFF'S
DEPARTMENT; BILL COGBILL; COUNTY
OF SONOMA; CALIFORNIA FORENSIC
MEDICAL GROUP, INC; JAMES LUDERS,
M.D.; MICHAEL E. DAGEY, R.N.; SUTTER
HEALTH; SUTTER MEDICAL CENTER OF
SANTA ROSA; EDWARD W. HARD, M.D.;
RICHARD FLINDERS, M.D.; JOSEPH N.
MATEL, M.D.; NORICK JANIAN, M.D.;
ANGUS MATHESON, M.D., and DOES 1
through 25, inclusive,

Defendants.

Case No. 3:08-cv-02675-EDL

ECF Case

**STIPULATION AND ~~PROPOSED~~
ORDER RE PLAINTIFFS' TIME TO
RESPOND TO DEFENDANTS
RICHARD FLINDERS, M.D.'S, AND
JOSEPH N. MATEL, M.D.'S MOTION
TO DISMISS AND NORICK JANIAN,
M.D.'S MOTION TO JOIN**

JURY TRIAL DEMANDED

IT IS HEREBY STIPULATED AND AGREED by and between the undersigned counsel for all parties, that subject to the Court's approval, the date for Plaintiffs to respond to Defendants Richard Flinders, M.D.'s and Joseph N. Matel, M.D.'s motion to dismiss and Defendant Norick Janian, M.D.'s motion to join therein shall be as follows:

- (i) Plaintiffs' response to the above-described Defendants' motion to dismiss and motion to join shall be due April 7, 2009.
- (ii) Defendants' respective replies in support of their motions shall be due April 14, 2009.
- (iii) The return date of these motions shall be extended to April 28, 2008.

SO STIPULATED.

DATED: March 23, 2009

ROGASKI PREOVOLOS WEBER &
PATTERSON

By: /s/
 Chester Rogaski

241 Georgia Street
Vallejo, CA 94590
Attorneys for Defendant Norick Janian, M.D.

DATED: March 23, 2009

HASSARD BONNINGTON LLP

By: /s/
 Joanna Storey

Two Embarcadero Center, Suite 1800
San Francisco, CA 94111
*Attorneys for Defendants Richard Flinders,
M.D. and Joseph N. Matel, M.D.*

DATED: March 23, 2009

SANFORD WITTELS & HEISLER, LLP

By: /s/ Thomas Marc Litton
Thomas Marc Litton (CA Bar # 119985)

120 Montgomery Street, Suite 1600
San Francisco, CA 94104

Steven L. Wittels
SANFORD WITTELS & HEISLER, LLP
950 Third Avenue, 10th Floor
New York, NY 10022
(admitted pro hac vice)

Attorneys for Plaintiffs

March 25, 2009

SO ORDERED: _____

